

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LUCKY BUCKS HOLDINGS LLC,

Debtor.

Chapter 7

Case No. 23-10756 (KBO)

MARC ABRAMS,
In his capacity as Chapter 7 Trustee of
Lucky Bucks Holdings LLC and as
assignee,

Plaintiff,

v.

TRIVE CAPITAL MANAGEMENT LLC,
TRIVE CAPITAL FUND III LP, TRIVE
CAPITAL FUND III-A LP, TCFIII LUCK LP,
TCFIII LUCK SPV LP, TCFIII LUCK
ACQUISITION LLC, SHRAVAN THADANI,
LUCKY BUCKS VENTURES, INC., ANIL
DAMANI, SOUTHERN STAR GAMING
LLC, SHAFIK KASSAM, JAMES BOYDEN,
RYAN BOUSKILL, RYAN C BOUSKILL
PROFESSIONAL CORPORATION, 2786692
ONTARIO INC., MANU SEKHRI,
STEPHANIE LIPPA, and HASSAN IJAZ,

Defendants.

Adversary Proceeding

Adv. Proc. No. 24-50130 (KBO)

Re: Adv. Docket No. 58

**NOTICE REGARDING SEALED AMENDED COMPLAINT FILED AT ADVERSARY
PROCEEDING DOCKET NO. 58**

PLEASE TAKE NOTICE that on January 21, 2025, plaintiff Marc Abrams (the “**Trustee**”), in his capacity as the Chapter 7 Trustee of and for Lucky Bucks Holdings LLC and

as assignee, filed a First Amended Complaint (the “**Amended Complaint**”) against Defendants Trive Capital Management LLC, Trive Capital Fund III LP, Trive Capital Fund III-A LP, TCFIII Luck LP, TCFIII Luck SPV LP, TCFIII Luck Acquisition LLC, Shravan Thadani, Lucky Bucks Ventures, Inc., Anil Damani, Southern Star Gaming LLC, Shafik Kassam, James Boyden, Ryan Bouskill, Ryan C Bouskill Professional Corporation, 2786692 Ontario Inc., Manu Sekhri, Stephanie Lipka, and Hassan Ijaz (collectively, the “**Defendants**”).

PLEASE TAKE FURTHER NOTICE that, out of an abundance of caution, the Trustee filed the unredacted version of the Amended Complaint under seal (*see* Adversary Docket No. 58) and filed a redacted Amended Complaint (*see* Adversary Docket No. 57) because certain additional fact information in the Amended Complaint may be considered confidential.

PLEASE TAKE FURTHER NOTICE that the Trustee filed the Amended Complaint under seal so that counsel for the Trustee could confer with counsel for each of the producing parties (*i.e.*, the Defendants) regarding whether any redactions to the Amended Complaint were necessary.

PLEASE TAKE FURTHER NOTICE that, after conferring with counsel for each of the producing Defendants regarding whether any redactions to the Amended Complaint were necessary, counsel for each of the producing Defendants confirmed to counsel for the Trustee that no redactions to the Amended Complaint are necessary and the unredacted Amended Complaint filed under seal on January 21, 2025 at Adversary Proceeding Docket No. 58 may be unsealed and publicly filed.

PLEASE TAKE FURTHER NOTICE that, accordingly, the Court may unseal the unredacted Amended Complaint filed under seal on January 21, 2025 at Adversary Proceeding Docket No. 58.

Dated: January 24, 2025
Wilmington, Delaware

WHITEFORD, TAYLOR & PRESTON LLC

By: /s/ William F. Taylor, Jr.
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-and-

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*Counsel to Plaintiff Marc Abrams, in his
capacity as the Chapter 7 Trustee of and for
Lucky Bucks Holdings LLC and as assignee*